

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region I

Main St
East Hartford

APR 1

DATE: APR 27 1987

SUBJ: RCRA Inspection: Pratt and Whitney Aircraft Group

FROM: Stanley D. Chin, Environmental Engineer
ME Waste Regulation Section

TO: Gerard A. Sotolongo, Chief
ME Waste Regulation Section

RCRA RECORDS CENTER
FACILITY Pratt & Whitney - Main St
I.D. NO. CTD99 2672081
FILE LOC. R-10
OTHER RDMS #2536

I. GENERAL INFORMATION

A. Facility Name: Pratt and Whitney Aircraft Group
400 Main Street
East Hartford, Connecticut 06108
and
Colt Street
East Hartford, Connecticut 06108

B. RCRA Contact: Kevin Vidmar

C. Date of Inspection: February 4, 1987

D. Purpose of Inspection: Referral from CT DEP.

E. Personnel Participating in the Inspection:

U.S. EPA - Tom Michel
Stanley Chin

Pratt and Whitney - Kevin Vidmar
Lawrence Lucia

II. RCRA Reporting and Information Requirements

- ° Facility I.D. Nos. Main St. - CTD 990672081
Colt St. - CTD 000844399
- ° Type of operation (both facilities): Generator, Transporter, TSDF.
- ° Type of operation for which notification has been received (both facilities): Generator, Transporter, TSDF.
- ° Date of notification (both facilities): August 18, 1980
- ° Date of submittal of Part A to EPA (both facilities): November 18, 1980.

III. Source Description

Pratt and Whitney, a division of United Technologies, manufactures aircraft engines and parts for commercial and military use.

The major industrial operations occurring at the Main Street facility include general machining, electrolytic grinding, alkaline washing, heat treating, annealing, pickling, electro-plating, painting, brazing, x-ray inspecting and photographic work. These industrial operations generate varying quantities of wastes: acids and alkalines, chromiums, cyanides, halogenated and non-halogenated solvents, paint and paint solids and sludges.

The Colt Street facility is a NPDES permitted waste water treatment facility. The facility discharges to Willow Brook. There are two unlined lagoons at this facility which are no longer in use. Metal hydroxide sludge was excavated and removed from the lagoons in 1985. Pratt and Whitney is monitoring the area around the lagoons for possible contamination. The sludge is now being disposed of at Pratt and Whitney's Middletown facility.

IV. OBSERVATIONS

- A. The Main Street facility operated three (3) greater than 90 day storage areas, eight (8) storage tanks and many satellite accumulation areas. The facility has submitted its Part B application to the CT DEP and EPA. No action has been taken on the application as yet.

1. Drum Storage Areas

The container storage building was the main storage area for drums of hazardous waste generated by Pratt and Whitney. The building was approximately 60' x 60' and had a solid concrete floor, three walls and a roof. The south side of the building is open to the ambient air. The floor had visible staining and adsorbent material was found in some areas. There were four instances where aisle space was either blocked or nonexistent. Several drums were found severely dented although none were found leaking. There were eight crates of lab wastes in the container storage building. Two of these crates were on placed on top of drums containing corrosive

wastes. Mr. Vidmar did not know exactly what the lab wastes consisted of. The lab wastes appeared to be placed in the crates haphazardly. See Attachment I for a schematic diagram of the building.

Another drum storage area was located on the south side of the Concentrated Waste Treatment Plant (CWTP) building. There were approximately 20 drums there. All were in good condition. However, the facility only recently began maintaining inspection logs for this area. Also, this area was not included in Pratt and Whitney's original Part B application. Pratt and Whitney was in the process of amending its Part B to include this area. The facility took these actions at the request of the CT DEP during its September 1986 inspection.

There were numerous satellite storage areas around the plant. According to Pratt and Whitney, these areas accumulate less than one-55 gallon drum before the waste is moved to the 90 day storage areas. EPA inspected three of these areas (x-ray shop, paint shop and a degreasing area) and did not find any accumulation of wastes greater than 55 gallons.

2. Transporter Pad

The transporter pad was used to store large (375 gallon) waste containers. These containers were used to move large quantities of plating fluids or degreasing solvents from the process areas to the waste storage areas. The transporters empty their contents at dumping stations at the edge of the container storage building. According to the CT DEP, considerable volatilization of the waste occurs during the emptying of the transporters. This could not be confirmed or denied during the inspection because no transporters were being emptied. Waste liquids then flow to the appropriate storage tanks located adjacent to the storage building. There was only one transporter on the pad during the inspection and it was empty. Inspection logs were reviewed and found to be in order.

3. Storage Tanks

The facility operated eight (8) above ground storage tanks. There were two tanks each for

waste cyanide and waste acid storage. There was one tank each for waste alkali, waste chromium, waste solvent and waste solvent blend storage. The waste alkali, acid and chromium were treated at the CWTP. All other wastes from these tanks were transported off-site. The tanks were open at the top which allowed wastes to volatilize in ambient air.

- B. The Colt Street facility treated some of the waste streams generated by the Main Street facility (acids, alkalis and chromiums). Metal hydroxide sludge from chemical treatment of these waste streams was transported to Pratt and Whitney's Middletown facility for disposal.

1. Lagoons

The facility formerly operated two unlined lagoons to dispose of the metal hydroxide sludge. The lagoons were cleaned out, filled and seeded in 1985 and were no longer accepting any sludge. The facility was monitoring four (4) wells to assure that no contamination was occurring. Wells were examined and found to be in good condition, located correctly with respect to the facility map and locked securely. Post-closure financial assurance was now being maintained by Pratt and Whitney for the lagoons. This was not the case during past CT DEP inspections.

V. SUMMARY OF VIOLATIONS

The following represents a list of violations observed at Pratt and Whitney.

Main Street Facility

1. Failure to maintain aisle space (40 CFR § 265.35).

There were four instances where aisle space was either blocked or nonexistent in the container storage building.

Classification of Violation - I

2. Failure to maintain containers holding hazardous waste in good condition (40 CFR § 265.171).

Several drums in the storage building were severely dented although not leaking.

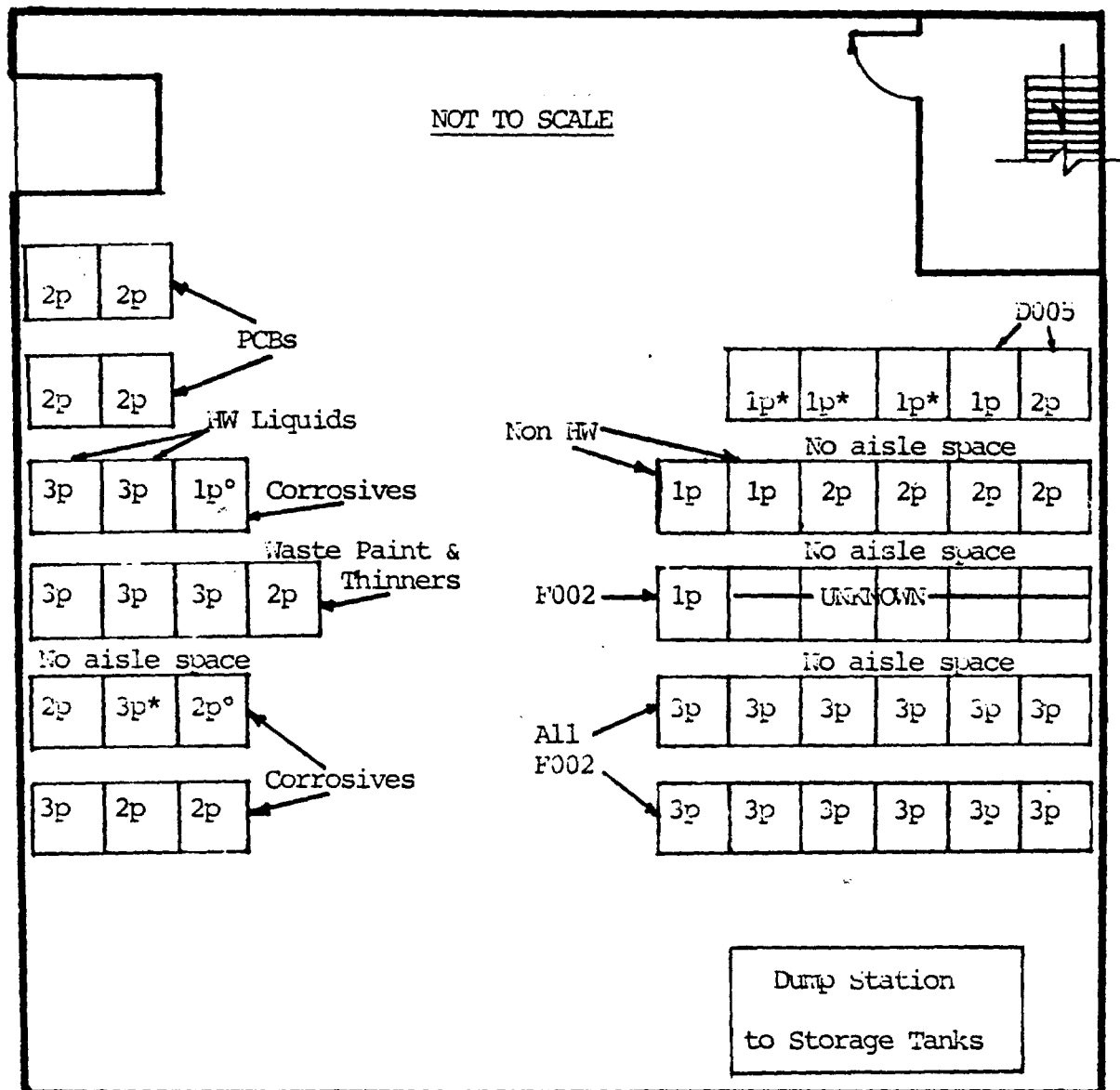
Classification of Violation - I

Colt Street Facility

No violations found at this facility during the inspection.

ATTACHMENT I

CONTAINER STORAGE BUILDING



- xp - pallets, x high
- * - lab wastes in open crates, x high
- ° - lab wastes in open crates on top of pallets of drums

UNITED TECHNOLOGIES CORPORATION
PRATT AND WHITNEY AIRCRAFT GROUP
EAST HARTFORD, CONNECTICUT
APRIL 24, 1987